

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SWARM INDUSTRIES, INC., et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Case. No.: 1:24-cv-02052-CMH-WBP
	:	
PATRICIA SCHOUKER,	:	
	:	
Defendant.	:	


DECLARATION OF PATRICIA SCHOUKER

I, Patricia Schouker, declare as follows:

1. As Defendant in this action, I have personal knowledge of the facts set forth herein, and if called and sworn as a witness, I could and would competently testify to the matters herein as being within my own personal knowledge and belief.
2. Prior to this lawsuit, I had no inkling or indication that Swarm Technologies Inc. (“STI”) existed, much less had any protections, trade secrets, or any other involvement with Swarm Industries, Inc. dba PolySwarm (“Swarm”).
3. I have no physical evidence that is in any way related to this case, the allegations therein, or my employment whatsoever, and none located in Virginia. Any such evidence is entirely digital and exists in a cloud platform, not on any personal hard drives or similar physical storage devices.
4. While I worked for Swarm, and was therefore privy to Steven Bassi Jr.’s whereabouts, I know that he traveled frequently to California and that he has at least one other business with a significant presence in California.
5. Several witnesses of conduct that I believe to be discriminatory reside in California.

The foregoing statement is made under penalty of perjury under the laws the United States of America and is true and correct.

Executed: March 18, 2025,



Patricia Schouker